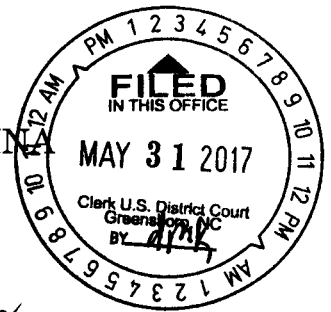


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

MICHAEL WAYNE BOYLES

1:17CR 218-1

The Grand Jury charges:

COUNT ONE

From on or about April 28, 2016, continuing up to and including on or about May 4, 2016, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, and elsewhere, MICHAEL WAYNE BOYLES knowingly transported, and aided and abetted in the transportation of, an individual, to wit: Jane Doe 1, in interstate commerce with the intent that such individual engage in the business of prostitution, in violation of the North Carolina General Statutes, Chapter 14, Article 27; in violation of Title 18, United States Code, Sections 2421 and 2.

COUNT TWO

From on or about April 28, 2016, continuing up to and including on or about May 4, 2016, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, and elsewhere, MICHAEL WAYNE BOYLES did knowingly and intentionally provide and

obtain, and attempt to provide and obtain, the labor and services of a person, to wit: Jane Doe 1, by means of threats of physical force to that person, by means of threats of serious harm to that person, and by means of a scheme, plan, and pattern intended to cause such person to believe that, if that person did not perform such labor and services, that person would suffer serious harm and physical restraint; in violation of Title 18, United States Code, Sections 1589(a), 1594(a), and 2.

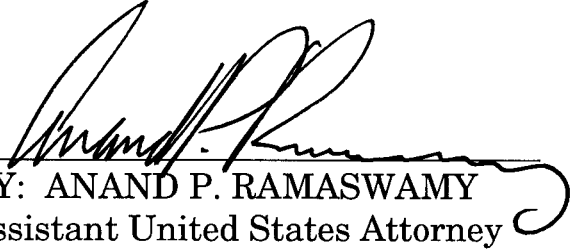
COUNT THREE

From on or about April 28, 2016, continuing up to and including on or about May 4, 2016, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, and elsewhere, MICHAEL WAYNE BOYLES did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and benefit financially and receive anything of value from participation in a venture which did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person, to wit: Jane Doe 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and any combination of such means, would be used

to cause Jane Doe 1 to engage in a commercial sex act: in violation of Title 18,
United States Code, Sections 1591(a)(1), (a)(2), (b)(1), and 2.

DATED: May 30, 2017

SANDRA J. HAIRSTON
Acting United States Attorney


BY: ANAND P. RAMASWAMY
Assistant United States Attorney

A TRUE BILL: